



Department of Ecology

June 2021 - Agency Update

David Bowen, Nuclear Waste Program Manager

Outline

- Organizational Structure
- Recruitment
- B-109 Tank Notification
- Holistic negotiations
- Compliance & Permitting activities

Organizational Structure

- NWP is wrapping up planning for changes to our organizational structure
 - Analysis began in January 2020 with an Organizational Assessment
 - Staff Advisory Group was formed to represent a cross section of our workforce
 - Fall 2020 a sub-group, Org Structure Workgroup, analyzed multiple solution sets developed from assessment data and provided potential recommendations
 - The Richland Management Team selected a recommended structure change that supports bringing DFLAW on line, maintains continuity of Site-wide Permit development (Rev 9), and provides equity in supervisory responsibilities
 - We developed an implementation plan that will transition us over the next ten to twelve months – impacts to those interacting with our team from outside the agency should be negligible
 - Next step is focusing on recruitment

Recruitment

COVID-19 and Org Structure change has delayed some hiring efforts creating a ~17% vacancy rate – typical vacancy rate is 8-9%

- 30% of the Ecology workforce is eligible for retirement – longevity or age

Priorities:

- Re-engage recruitment efforts to fill vacancies
- Fill acting positions with permanent appointees
- Knowledge transfer and mentoring the next generation of our team is critical for long-term success

B-109 - Next Steps

The Tri-Party Agreement sets forth the process that USD OE and Ecology must follow when a potential Single Shell Tank (SST) leak has been detected.

- USD OE conducts a formal leak assessment to determine the likelihood of an active liner leak – initiated July 2020
- Once a leak has been confirmed through this assessment process notification must be made – April 29, 2021
- USD OE and Ecology Project Managers must attempt to reach unanimous agreement about appropriate response - next steps – Underway now
- If unanimous agreement is not reached, Ecology retains the ability to initiate an enforcement action directly under its Hazardous Waste Management Act (HWMA) authority. Ecology may issue an administrative order in order to compel compliance with WAC 173-303-610(7) and WAC 173-303-145(3).

Holistic Negotiations

- Ecology proposed holistic negotiation of tank waste retrieval, treatment
- Federal Mediation and Conciliation Service facilitates discussions
- EPA is participating in the sessions in addition to USDOE, US Department of Justice, Ecology, and the Washington Attorney General Office
- Per mediation agreement, and to encourage open discussion, the parties agreed to not discuss details of status or progress during the negotiations
- Meetings have been weekly, and parties have agreed to continue

Ecology Compliance Activities

March 2021 to May 2021

Inspections Conducted

- Centralized Consolidation/Recycling Center – March 23, 2021
- Double Shell Tank System and 204-AR – March 25, 2021
- Central Waste Complex (CWC) – April 27, 2021
- Waste Receiving and Processing Facility (WRAP) – April 27, 2021
- T Plant Complex – May 11, 2021
- 242-A Evaporator – May 12, 2021
- Puget Sound Naval Shipyard – May 25, 2021

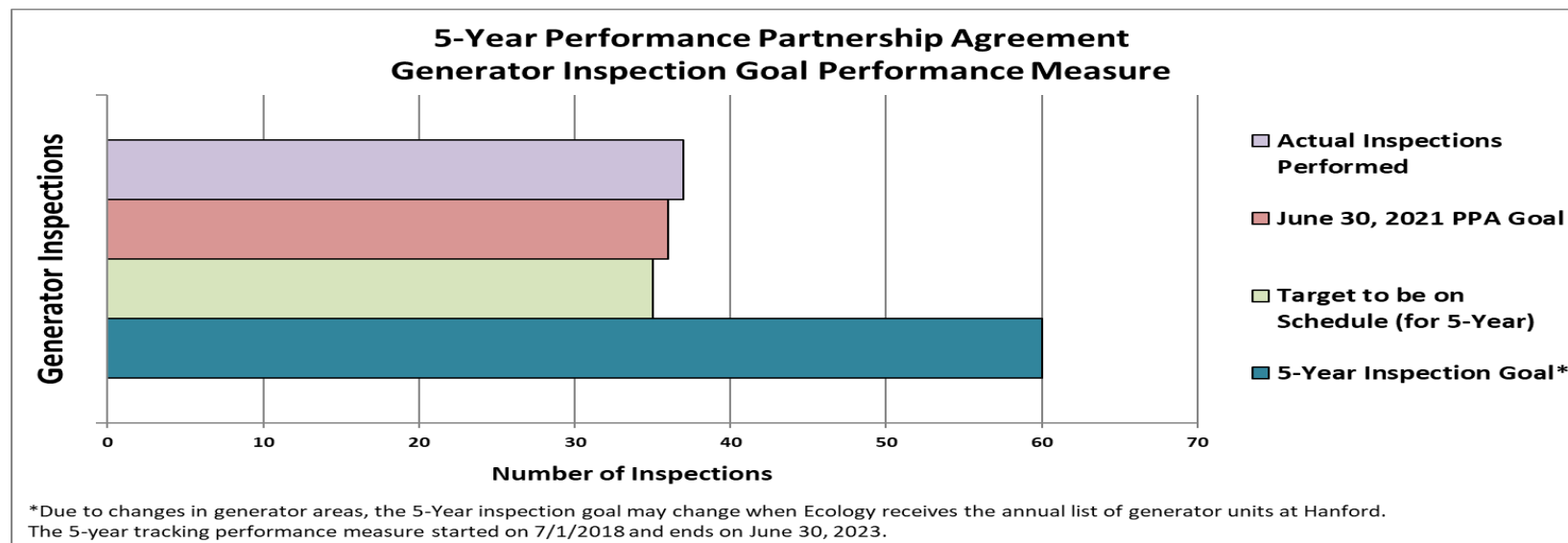
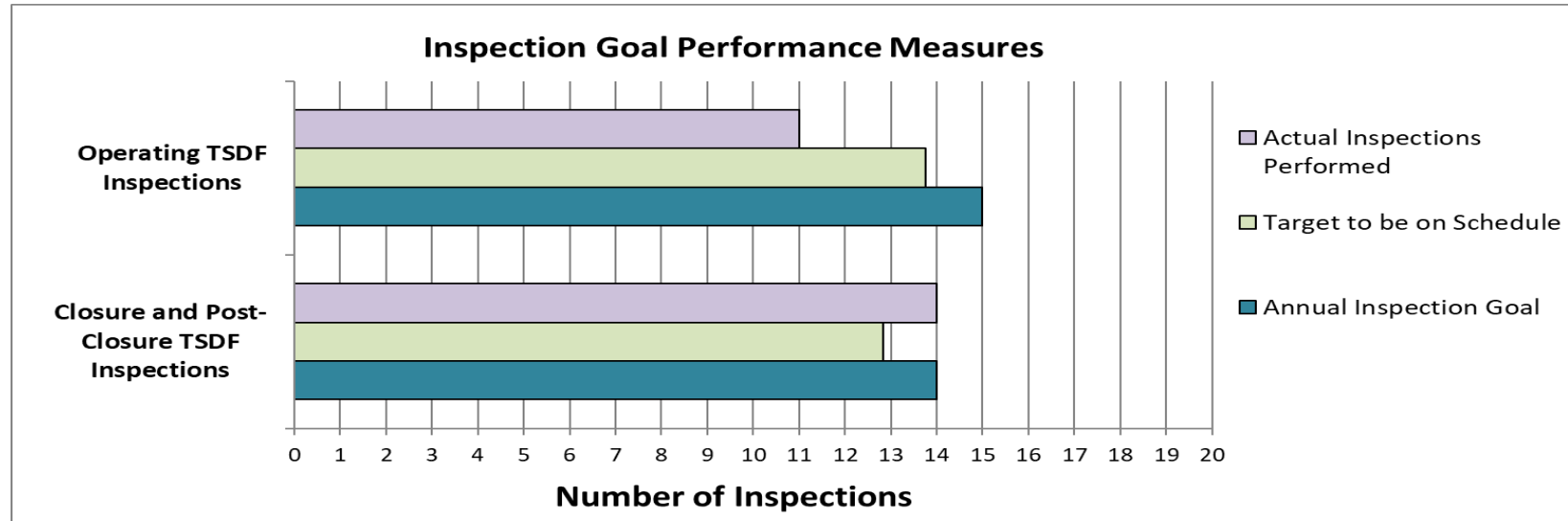
Ecology Compliance Activities

March 2021 to May 2021

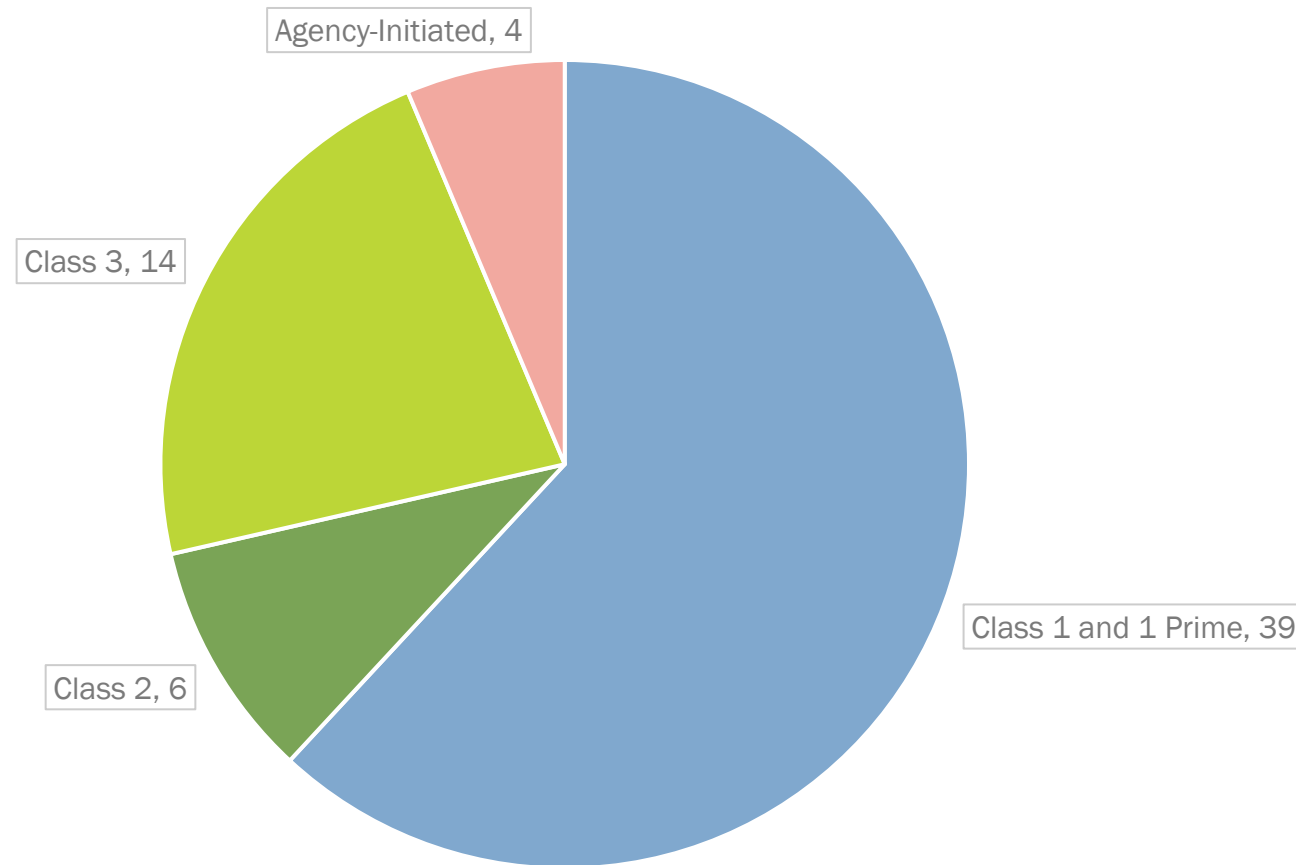
Compliance Reports Issued

- 400 Area Waste Management Unit – March 9, 2021
- Low Level Burial Grounds Trench 94 – March 22, 2021
- Low Level Burial Grounds Trenches 31 and 34 – April 2, 2021
- Single Shell Tank System – May 7, 2021

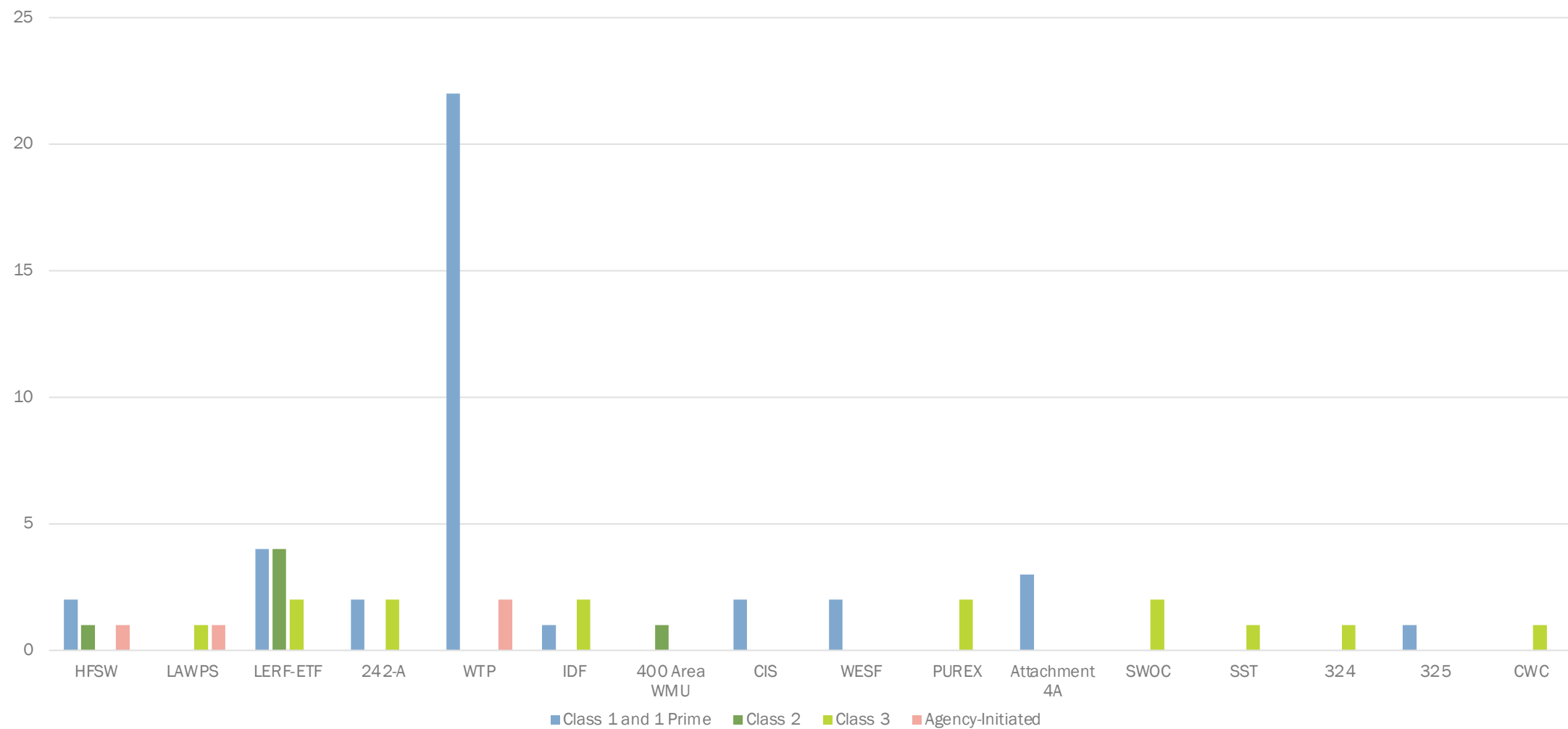
Inspection Goal Performance



Hanford Site-wide Permit Rev. 8c Permit Modifications



Hanford Site-wide Permit Rev. 8c Permit Modifications by Unit Group



Opportunities for Public Involvement



Unit	Public Comment Period
<u>Class 3 Permit Modification</u> – The Class 3 permit modification incorporates proposed permit information on the Leachate Collection System in the Integrated Disposal Facility, Operating Unit Group 11 of the Hanford Site-wide Permit.	May 24 - July 23, 2021
<u>Class 2 Permit Modification</u> – The Class 2 permit modification proposes permit language in support of the Supplemental Organic Treatment for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF-ETF).	June - July 2021
<u>Agency-Initiated Permit Modification</u> – The Low-Activity Waste Pretreatment System, Operating Unit Group 1 will propose permit modifications in support of startup and operations of the facility.	June 28 - August 12, 2021
<u>Class 2 Permit Modification</u> – The Class 2 permit modification proposes updates to the Groundwater Monitoring Plan for the LERF-ETF	July 22 - September 20, 2021
<u>Class 3 Permit Modification</u> – (Second Portion) The Class 3 permit modification will propose operating information in the Integrated Disposal Facility.	August 9 - September 22, 2021

Opportunities for Public Involvement



Unit	Dates
<u>Class 3 Permit Modification</u> – PUREX Class 3 permit modification (second portion) to address closure of tanks TK-P4 and TK-40 and bring this Closing Unit Group into the permit.	June 7 - July 23, 2021
<u>State Waste Discharge Permit</u> – ST0004502 – Treated Effluent Disposal Facility permit renewal	Summer 2021
<u>Criteria and Toxics Approval Order Modification</u> – DE07NWP-003 - Modification for the construction of LERF Basin 41 and operation of all LERF Basins to receive DFLAW effluent.	Spring 2021
<u>Criteria and Toxics Approval Order</u> – New approval order for the site-wide water infrastructure upgrades project.	Late Spring/Early Summer 2021

Acronyms Legend

HFSW: Hanford Facility Site Wide
LAWPS: Low Activity Waste Pre-Treatment
LERF-ETF: Liquid Effluent Retention Facility-Effluent Treatment Facility
242-A: 242-A Evaporator
WTP: Waste Treatment Plant
IDF: Integrated Disposal Facility
400 Area WMU: 400 Area (Fast Flux Test Facility) Waste Management Units
CIS: Cesium Interim Storage
WESF: Waste Encapsulation Storage Facility

PUREX: 221-A Building aka PUREX Plant complex
Attachment 4A: attachment to the permit “Building Emergency Directors/Building Wardens
SWOC: Solid Waste Operations Complex includes T Plant, Central Waste Complex, Waste Receiving and Processing facility
SST: Single Shell Tank System
324: 324 Building
325: 325 Building
CWC: Central Waste Complex



Questions?

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